

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL NO. 09-276
v.	*	SECTION: "A"
FLORENCE RANDLE	*	VIOLATION: 18 U.S.C. §1341
a/k/a Florence Diggs Randle		
a/k/a Florence Marie Diggs	*	
a/k/a Florence Diggs		
a/k/a Florence Sims	*	
a/k/a Florence Wheaton		
a/k/a Florence Marie Wheaton	*	
	* * *	

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits including the testimony of special agents of the United States Postal Inspection Service, employees of the American Red Cross ("Red Cross") and others, the following facts to support the allegations charged by the United States Attorney in the Indictment now pending against the defendant, **FLORENCE RANDLE**.

An employee of the Red Cross would testify that in the weeks and months after Hurricane Katrina, which struck southeastern Louisiana on August 29, 2005, the Red Cross maintained disaster

recovery centers to assist victims of Hurricane Katrina. Through these recovery assistance efforts, the Red Cross provided financial assistance to residents displaced or otherwise affected by Hurricane Katrina. People affected by the storms were able to apply for a one-time only financial grant of up to \$1,565 from the Red Cross. In order to receive these funds, applicants needed to present identification to a Red Cross representative that indicated residence in an affected zone. Applicants were also required to swear and attest that they had not received any undisclosed additional American Red Cross financial assistance at any other Red Cross assistance location.

Competent testimony would be introduced that once approved, the Red Cross made these disaster assistance funds available in one of four ways: (1) A personal check made payable to the applicant, issued on-site, and cashed with the assistance of the Red Cross; (2) A Red Cross-issued Discover or Capital One card, issued on-site; (3) A Red Cross-issued Client Assistance Card, issued on-site, and purchased by the Red Cross from private banking institutions; (4) A personal check authorized by the Red Cross, issued by Paychex, Inc, and mailed to the individual.

An employee from Paychex, Inc., a Rochester, NY-based company that had volunteered its services to the Red Cross, would testify that the company processed and issued personal checks to applicants as deemed appropriate and authorized by the Red Cross. These checks were mailed to applicants via the United States Postal Service.

Testimony by an employee of the Red Cross and admissible exhibits would be introduced to prove that the defendant, **RANDLE**, presented herself to Red Cross assistance centers to apply for a financial grant on fourteen occasions between on or about September 10, 2005 and on or about October 25, 2005. On at least nine visits, she applied for financial assistance and indicated that she had not received any other financial assistance from the Red Cross.

As a result of her actions on these applications, **RANDLE** was authorized to receive \$19,510 in benefits from the Red Cross. Only the first application was legitimate. Ultimately, she received direct financial assistance from the Red Cross totaling \$13,550, of which \$12,285 was fraudulently obtained.

Competent testimony and admissible exhibits would be introduced to prove that one of the fourteen occasions that **RANDLE** applied for assistance was October 16, 2005. On this date, the Red Cross authorized her to receive a personal check, issued by Paychex, and made payable to her. On or about October 26, 2005, Paychex sent this check via United States Mail to P.O. Box 353, Gibson, Louisiana 70356, which was registered in her name and located in the Eastern District of Louisiana.

Further testimony by employees of the Red Cross would be introduced to prove that the defendant was required to attest and affirm that she had not received any other financial assistance at any other Red Cross assistance center. Exhibits, including the defendant's applications on September 23, 2005, September 25, 2005, September 30, 2005, October 2, 2005, October 5, 2005, October 14, 2005, October 18, 2005, October 23, 2005, and October 25, 2005 would be introduced to show that the defendant specifically attested and swore that she had not received any other financial assistance from the Red Cross, when she had, in fact, received such assistance prior to these dates.

Testimony and exhibits would be presented to show that one check was mailed on October 26, 2005 as a result of the defendant's application at Red Cross assistance centers. An employee of Paychex would be called to testify as to the procedures and means by which the check came to be sent to **RANDLE** address of P.O. Box 353, Gibson, Louisiana. Through this witness, certain

documents and exhibits would be offered and introduced into evidence to prove that the defendant's fraudulent application and actions directly led to the mailing of the check.

A witness from the United States Postal Inspector Service would testify that P.O. Box 353, Gibson, Louisiana belonged to **RANDLE**.

RANDLE admits that she applied for Red Cross benefits fourteen times in September and October of 2005 and that she intended to defraud the Red Cross by indicating on numerous applications that she had not previously applied for Red Cross benefits in the past. **RANDLE** admits that she was aware she could only apply for Red Cross benefits one-time and acknowledges that her actions caused the mailing of one checks to P.O. Box 353, Gibson, Louisiana, in the Eastern District of Louisiana, in violation of Title 18, United States Code, Section 1341.

READ AND APPROVED:

DONALD SAUVIAC (Date)
Counsel for FLORENCE RANDLE

SHARAN E. LIEBERMAN (Date)
Assistant U.S. Attorney

FLORENCE RANDLE (Date)
Defendant